

Appl. No. : 09/927,894  
Filed : August 10, 2001

## REMARKS

### I. Rejections of Claims 57 and 59 under Sections 112 and 101

Applicants submit that the rejections of Claims 57 and 59 under sections 112 and 101 have been overcome by the amendments made herein to these claims.

### II. Anticipation Rejection

Applicants respectfully submit that the anticipation rejections of Claims 1-37 and 54-59 over Brown et al. are improper for the reasons set forth below, among others.

#### Independent Claim 1

With respect to Claim 1, Brown et al. does not explicitly or inherently disclose a host computer and a storage server that “perform input/output (I/O) operations over the at least one network using multiple, concurrent logical connections, each logical connection being between the host computer and the storage server over the at least one computer network, such that a first I/O operation is executed over a first logical connection while a second I/O operation is executed over a second logical connection.” As discussed during the telephone interview, Brown et al.’s disclosure of a host that runs AMFs that provide concurrent access to multiple redundancy groups does not inherently disclose this feature. In this regard, concurrent access as disclosed in Brown et al. can be provided without the claimed use of multiple, concurrent logical connections between a host computer and a storage server.

#### Independent Claim 19

By the foregoing amendment, Applicants have amended Claim 19 to more clearly distinguish the claim from Brown et al. Applicants submit that Brown et al. does not disclose all of the limitations of the claim. For example, Brown et al. does not explicitly or inherently disclose “wherein each host computer is programmed to open multiple concurrent socket connections over the network to the storage servers and to perform input/output operations in parallel over the multiple concurrent socket connections.”

#### Independent Claim 28

With respect to Claim 28, Brown et al. does not explicitly or inherently disclose “performing a first input/output operation over the first TCP/IP connection concurrently with performing a second input/output operation over the second TCP/IP connection.” In fact, Brown

Appl. No. : 09/927,894  
Filed : August 10, 2001

et al. does not even appear to disclose the use of TCP/IP connections to perform input/output operations. Brown et al. also fails to disclose "maintaining the first and second TCP/IP connections is a persistent state such that each TCP/IP connection may be used to perform additional input/output operations."

Independent Claim 34

With respect to independent Claim 34, Brown et al. does not disclose "on the host computer, dividing the I/O request into multiple constituent I/O operations; and performing the multiple constituent I/O operations in parallel over multiple, respective logical network connections between the host computer and a target storage server."

Dependent Claims

Because Brown et al. does not disclose all of the limitations of any independent claim, the anticipation rejections of the independent and dependent claims are improper. The anticipation rejections of the dependent claims are also improper because Brown et al. does not disclose all of the limitations of the dependent claims.

By pointing out specific examples of distinctions over Brown et al., Applicants do not imply or admit that Brown et al. is prior art to the present application.

III. Conclusion

In view of the foregoing, Applicants request that the rejections of the claims be withdrawn.

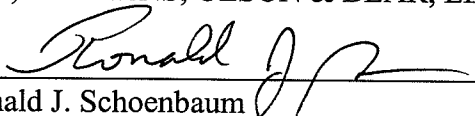
If any issues remain in the present application, the Examiner is requested to call the undersigned representative at his direct dial number of 949.721.2950.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: 1-18-06

By:

  
Ronald J. Schoenbaum  
Registration No. 38,297  
Attorney of Record  
Customer No. 20,995  
(949) 721-2950